



 an ARCADIS company

Transmitted Via Email

December 22, 2006

Mr. Sam Chummar
Remedial Project Manager
USEPA Region 5
Superfund Division
Remedial Response Section #1
77 W. Jackson Blvd. (SR-6J)
Chicago, IL 60604

Re: Georgia-Pacific Corporation Time Critical Removal Action Work Plan Letter Addendum #1
Project #: 645.85.675

Dear Mr. Chummar:

Pursuant to Section I.16.a of the November 20, 2006 Administrative Settlement Agreement and Order on Consent (AOC) for the Georgia-Pacific Mill Property, this letter serves as Addendum #1 to the *Time Critical Removal Action (TCRA) Work Plan for the Refuse Area at the Georgia-Pacific Corporation Kalamazoo Mill Property and the Oxbow Area at the Former Hawthorne Mill Property* (Work Plan) (BBL, May 2006).

Please add the following Section 3.4.5 to the Work Plan:

3.4.5 Underground Pipe

An underground pipe with PCB-containing residuals and the associated soils on the Georgia-Pacific Kalamazoo Mill Property (Kalamazoo Mill Property) will be removed pursuant to the goals of the TCRA. Approximately 1,700 feet of underground clay pipe to be removed runs from Mill No. 3 between Mill No. 4/Mill No. 1 and the Former National Gypsum Company, to an interceptor trench near the warehouse building (Figure 1 of Letter Addendum #1). The removal action contractor (Contractor) procured by Georgia-Pacific to perform the removal action activities estimates that approximately 1,500 cubic yards (cy) of soil are to be removed for this work.

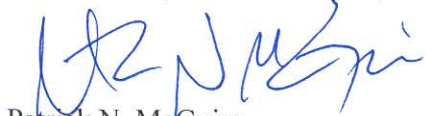
There are residuals in the underground pipe, which were sampled by the Contractor and analyzed for polychlorinated biphenyl (PCB). The two samples both contained PCB, which were quantified as Aroclors 1242 and 1254. The total PCB concentrations detected in these two samples are 1.5 mg/Kg and 5.4 m/Kg. The laboratory reports are provided in Attachment 1 of Letter Addendum #1. The excavated clay pipe, residuals, and soil will be consolidated and disposed of at the A-Site.

Verification sampling and analysis will be conducted within the underground pipe excavation area consistent with the verification sampling procedures and analysis described in Section 3.9 of this work plan for the Refuse Area and Oxbow Area excavations. Following post-excavation verification sampling and confirmation that the established cleanup criterion is not exceeded, the excavation area will be backfilled with certified clean backfill material and restored to match surrounding conditions.

If you have any questions regarding this addendum, please contact me at 315-671-9233.

Sincerely,

BLASLAND, BOUCK & LEE, INC.



Patrick N. McGuire
Associate

CWS/tld

cc: Eileen L. Furey, Esq., USEPA
J. Michael Davis, Esq., Georgia-Pacific Corporation
L. Chase Fortenberry, P.G., Georgia-Pacific Corporation

ATTACHMENT 1

POSITIVE RESULTS SUMMARY REPORT

Client: *Terra Contracting, L.L.C.*

KAR Project No.: **064225**

Date Reported: **9/29/2006**

Project

Description: *Analysis of two soil samples (#572).*

Sample Description: **"Black"**

Test	Positive Result Concentration	Units
PCB Aroclor 1242	4000	ug/kg dry sample
PCB Aroclor 1254	1400	ug/kg dry sample
PCB Aroclors, total	5400	ug/kg dry sample

Sample Description: **"Grey"**

Test	Positive Result Concentration	Units
PCB Aroclor 1248	720	ug/kg dry sample
PCB Aroclor 1254	820	ug/kg dry sample
PCB Aroclors, total	1500	ug/kg dry sample

This Positive Results Summary Report provides an overview of the sample set and CONTAINS ONLY RESULTS ABOVE THE REPORTING LIMIT. It should not be used as a substitute for the attached detail report.

KAR Laboratories, Inc.

(269) 381-9666

Positive Results Summary Report

Page 1 of 1

LABORATORY DETAIL REPORT

KAR Project No. : **064225**

Client: **Terra Contracting, L.L.C.**

Date Reported : **09/29/06**

Project

Desc. : **Analysis of two soil samples (#572).**

Sample ID : **"Black"**

Sampled By : **KWS of Terra Contracting, LLC**

Date Received : **9/22/2006**

Sample Date : **9/21/2006**

Sample Type : **soil**

Sample Time : **1500**

KAR Sample No. : **064225-01**

Test	Result	Units of Measure	Method	Analyzed	Analyst	Comments
Dry weight solids	62.18	% by weight	SM 2540 B mod.	09/22/06	BLF	
Prep, ECD	Completed		EPA 3545	09/25/06	MJY	Improper sample container; result is approximate.
PCB	See below		EPA 8082	09/26/06	GMB	Improper sample container; result is approximate.
PCB Aroclor 1016	<380	ug/kg dry sample	EPA 8082	09/26/06	GMB	
PCB Aroclor 1221	<380	ug/kg dry sample	EPA 8082	09/26/06	GMB	
PCB Aroclor 1232	<380	ug/kg dry sample	EPA 8082	09/26/06	GMB	
PCB Aroclor 1242	4000	ug/kg dry sample	EPA 8082	09/26/06	GMB	
PCB Aroclor 1248	<380	ug/kg dry sample	EPA 8082	09/26/06	GMB	
PCB Aroclor 1254	1400	ug/kg dry sample	EPA 8082	09/26/06	GMB	
PCB Aroclor 1260	<380	ug/kg dry sample	EPA 8082	09/26/06	GMB	
PCB Aroclors, total	5400	ug/kg dry sample	EPA 8082	09/26/06	GMB	

Sample ID : **"Grey"**

Sampled By : **KWS of Terra Contracting, LLC**

Date Received : **9/22/2006**

Sample Date : **9/21/2006**

Sample Type : **soil**

Sample Time : **1510**

KAR Sample No. : **064225-02**

Test	Result	Units of Measure	Method	Analyzed	Analyst	Comments
Dry weight solids	66.14	% by weight	SM 2540 B mod.	09/22/06	BLF	
Prep, ECD	Completed		EPA 3545	09/25/06	MJY	Improper sample container; result is approximate.
PCB	See below		EPA 8082	09/26/06	GMB	Improper sample container; result is approximate.
PCB Aroclor 1016	<330	ug/kg dry sample	EPA 8082	09/26/06	GMB	
PCB Aroclor 1221	<330	ug/kg dry sample	EPA 8082	09/26/06	GMB	
PCB Aroclor 1232	<330	ug/kg dry sample	EPA 8082	09/26/06	GMB	
PCB Aroclor 1242	<330	ug/kg dry sample	EPA 8082	09/26/06	GMB	
PCB Aroclor 1248	720	ug/kg dry sample	EPA 8082	09/26/06	GMB	
PCB Aroclor 1254	820	ug/kg dry sample	EPA 8082	09/26/06	GMB	
PCB Aroclor 1260	<330	ug/kg dry sample	EPA 8082	09/26/06	GMB	
PCB Aroclors, total	1500	ug/kg dry sample	EPA 8082	09/26/06	GMB	

KAR Laboratories, Inc.

(269) 381-9666

Laboratory Detail Report

Page 1 of 1

Client: **PERRA CONTRACTING**

Attn: **Ketch**

Phone: () Fax: ()

Cell: (269) 440-7377 Email:

Project Name:

Project #

P.O. #

Sampled by: **KAR** Client **KCS** Initials

Turnaround Time:

- ☒ 10-business days
☐ 5-business days (x 1.5)
☐ 3-business days (x 2.0)

☐ Emergency (quote)

Samples rec'd

Cold: ☒ Y ☐ N Intact: ☒ Y ☐ N

Requested Analyses

KAR use only

Proj# **064225**

Login: **AS**

Date: **9/22/06**

c-of-c ☒ Y ☐ N

labels ☒ Y ☐ N

LODs ☒ Y ☐ N

contain ☒ Y ☐ N

headspace ☒ Y ☐ N

amount ☒ Y ☐ N

hold time ☒ Y ☐ N

rush cost ☒ Y ☐ N

Remarks

Sample Identification Date Sample Info Time Matrix Type Size

1 Black 9-21-06 3:00PM Soil P Bag 1

2 Grey 9-21-06 3:10PM V P Bag 1

Relinquished By:

David M. Schmitt

Received By:

Tamara Brown

Date/Time:

9/22/06

Notes:

OK to quality
\$260

Received By:

Date/Time: